

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, *et al.*, *ex*  
*rel.* URI BASSAN,

Plaintiffs,

v.

OMNICARE, INC.,

Defendant.

Case No. 15-CV-4179-CM-VF

UNITED STATES OF AMERICA,

Plaintiff,

v.

OMNICARE, INC. and CVS HEALTH CORP.,

Defendants.

**DEFENDANTS' MOTION TO COMPEL PRODUCTION OF "DELIBERATIVE PRO-  
CESS" MATERIALS AND PROVIDE THOSE MATERIALS TO THE JURY**

Enu Mainigi (*pro hac vice*)  
Holly Conley (*pro hac vice*)  
William Ashworth (*pro hac vice*)  
Beth A. Stewart (*pro hac vice*)  
David Randall J. Riskin (*pro hac vice*)  
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*Attorneys for Omnicare, Inc. and  
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Defendants move for an order compelling the government to produce documents withheld on “deliberative process” grounds and permitting Defendants to read those documents to the jury before the close of Defendants’ case.

Dated: April 23, 2025

Respectfully submitted,

WILLIAMS & CONNOLLY LLP

/s/ Enu Mainigi

Enu Mainigi (*pro hac vice*)

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